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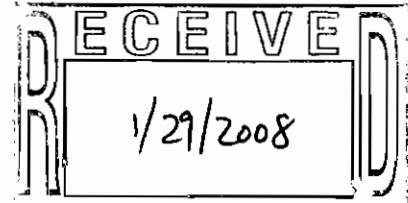
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DOC #:

DATE FILED: 2/4/08

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JUDGE CHIN'S CHAMBERS

January 28, 2008

**VIA FEDERAL EXPRESS**

Honorable Denny Chin, U.S.D.J.  
 Daniel Patrick Moynihan  
 United States Courthouse  
 500 Pearl St., Room 1020  
 New York, NY 10007

Re: Mary Anthony, et al. v. Rick Schussel, et al.  
 Civil Action No: 07CV6116

Dear Judge Chin:

This firm represents defendants Rick Schussel and The New Dance Group Studio, Inc. (the "New Dance Group") (collectively "Defendants") in the abovementioned matter. We respectfully ask that Your Honor grant a thirty (30) day extension of the current deadline for fact discovery and depositions. Under the current discovery schedule, all fact discovery and depositions are to conclude on January 30 and a pre-trial conference is currently scheduled for February 1.

Defendants seek the thirty (30) day extension in order to allow the parties additional time to reach a settlement agreement. After the November 28, 2007, settlement conference, the parties felt that a settlement could be reached in this matter and plaintiffs agreed to present Defendants with a settlement proposal. However, it took plaintiffs approximately five weeks to draft and send their settlement proposal, which was received by Defendants on January 4, 2008.

With the deadline for discovery and depositions coming to an end, plaintiffs recently sought to depose Mr. Schussel and inspect and copy the New Dance Group's archive records to complete its discovery. Unfortunately, Defendants' ability to respond to the settlement proposal, arrange for the deposition of Mr. Schussel and arrange for a time for

*Application GRANTED.  
 All discovery (fact)  
 still be  
 complete by  
 3/7/08. A pretrial  
 conference will be  
 held that day  
 at 11 a.m.*

SO ORDERED.

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plaintiffs' counsel to review the archives has been hampered by Mr. Schussel's work schedule, which required him to travel out of the country for over one week for business. Additionally, Mr. Schussel currently is not available to proceed with any discovery and settlement negotiations until after January 30 as he is undergoing a minor operation on January 28 and another medical procedure later this week.

For the foregoing reasons, Defendants respectfully request that Your Honor extend the deadline for fact discovery and depositions until at least February 29, 2008. Defendants also respectfully request that the pre-trial conference scheduled for February 1, 2008 be rescheduled in accordance with the proposed extension.

Plaintiff's counsel has been fully advised that Defendants are seeking the aforementioned extensions and are willing to meet with Defendants in mid-February to further discuss settlement. Plaintiff currently do not consent to the request for an extension as Defendants refuse to waive their rights to seek any additional extensions.

Thank you for Your Honor's attention to this matter.

Very truly yours,

  
Lori A. Jordan

cc: Katherine B. Forrest, Esq. (via facsimile)  
Alexandra B. Carter, Esq. (via facsimile)